

EXHIBIT A

Copy of Order Appointing Foreign Representative



Federal Court of Australia

District Registry: New South Wales Registry

Division: General

No: NSD1023/2022

LIGON 158 PTY LIMITED (IN LIQUIDATION) ACN 003 464 015 and others named in the schedule
Plaintiffs

SHIELD HOLDINGS AUSTRALIA PTY LIMITED (IN LIQUIDATION) ACN 078 881 035 and others named in the schedule
Defendants

ORDER

JUDGE: Justice Cheeseman

DATE OF ORDER: 9 January 2025

WHERE MADE: Sydney

THE COURT ORDERS THAT:

1. Pursuant to s 472 of the *Corporations Act 2001* (Cth), John Sheahan, registered liquidator be appointed as an additional liquidator (**Special Purpose Liquidator**) to the First Defendant to:
 - (a) obtain orders for delivery up (including by any banker) pursuant to s 483 of the Act of any books relating to the affairs of the First Defendant;
 - (b) conduct depositions or examinations and obtain orders for production of documents in any foreign jurisdiction; and
 - (c) do anything necessarily incidental thereto,for the purpose of:
 - (d) identifying the assets of the First Defendant and the location of those assets; or
 - (e) investigating potential claims which are or may be available to the First Defendant or a liquidator of the First Defendant against any third parties.
2. Pending further order of the court, the Special Purpose Liquidator may not, without leave of the Court:



- (a) commence or prosecute any action in the name of the First Defendant or as Special Purpose Liquidator of the First Defendant other than proceedings to enable him to do any of the things in order 1 above;
- (b) use any funds of the First Defendant or assert any entitlement to be paid out of funds of the First Defendant in respect of his appointment as Special Purpose Liquidator of the First Defendant.

3. The Special Purpose Liquidator shall confer with and take into account the views of the Third Defendant (the **General Purpose Liquidator**) prior to doing any of the things in order 1 above and promptly report to the General Purpose Liquidator on any thing done pursuant to order 1.

4. The Special Purpose Liquidator has liberty to apply to the Court on seven days' notice, with notice to be given to interested parties, the General Purpose Liquidator and ASIC, in respect of the leave identified in order 2.

5. Subject to order 6, the plaintiffs costs and 50% of the costs of the interested parties be costs in the liquidation of the First Defendant.

6. In the event that any party or interested person seeks to apply for an alternative costs order, the following timetable will apply:

- (a) By 15 January 2025, any party or interested person seeking an alternative costs order is to file and serve written submissions limited to two pages outlining the alternative costs order sought, together with any evidence in support;
- (b) By 20 January 2025, any party or interested person seeking to oppose the making of an alternative costs order is to file and serve written submissions limited to two pages outlining the basis of opposition, together with any evidence in support;
- (c) By 22 January 2025, any submissions in reply limited to one page and or any evidence in reply is to be filed and served;
- (d) Any application for an alternative costs order will be determined on the papers;
- (e) Any submissions and evidence filed and served pursuant to this order must be emailed to the Associate to Cheeseman J at the time they are served; and



(f) In the absence of an application being made in accordance with this order, within the timeframes stipulated, order 5 will take effect.

7. These orders be entered forthwith.

Date orders authenticated: 9 January 2025

Sia Lagos
Registrar

Note: Entry of orders is dealt with in Rule 39.32 of the *Federal Court Rules 2011*.



Schedule

No: NSD1023/2022

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Second Plaintiff	ERMA NOMINEES PTY LIMITED (IN LIQUIDATION) ACN 000 957 040
Third Plaintiff	ERBIN FINANCES PTY LTD (IN LIQUIDATION) ACN 138 259 800
Fourth Plaintiff	RAWBIN FINANCES PTY LIMITED (IN LIQUIDATION) ACN 140 576 549
Fifth Plaintiff	JOHN SHEAHAN IN HIS CAPACITY AS LIQUIDATOR OF THE FIRST TO FOURTH PLAINTIFFS
Second Defendant	AUSTRALIAN SECURITIES & INVESTMENTS COMMISSION
Third Defendant	ALAN WALKER
Interested Person	ANDREW JOHN BINETTER
Interested Person	MICHAEL BINETTER